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ATTORNEYS FOR DEFENDANT
APPLE INC.

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

FLATWORLD INTERACTIVES LLC

Plaintiff,

v.

APPLE INC.

Defendant.

John Steele (SBN 122872)

john.steele@johnsteelelaw.com

JOHN STEELE, ATTORNEYS AT LAW
2225 E. Bayshore Rd., Suite 200
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Case No. 3:12-01956-JSW (EDL)

**DECLARATION OF AARON C. TAGGART
IN SUPPORT OF APPLE INC.'S REPLY
MOTION TO DISQUALIFY HAGENS
BERMAN SOBOL SHAPIRO LLP OR, IN
THE ALTERNATIVE, TO STAY
PROCEEDINGS**

1
2 I, Aaron C. Taggart, declare and state as follows:

3 1. I am an attorney at Bridges & Mavrakakis LLP, counsel of record for Defendant
4 Apple Inc. in the above-captioned matter. The matters referred to in this declaration are based on
5 personal knowledge and if called as a witness I could, and would, testify competently to these
6 matters.

7 2. Attached hereto as **Exhibit 40** is a true and correct copy of Docket 25, Transcript of
8 Proceedings, from Case No. 10-04647 *Teraphase Engineering Inc. v. Arcadis, U.S., Inc.*

9 3. Attached hereto as **Exhibit 41** is a true and correct copy of Flatworld's Responses to
10 Apple's Third Set of Interrogatories, dated May 3, 2013.

11 4. Attached hereto as **Exhibit 42** is a is a true and correct copy of a July 6, 2007 email
12 from Jennifer McAleese of FlatWorld to Derek Wood of Rembrandt IP, Bates labeled REM-
13 00000432 and designated Confidential by Rembrandt IP.

14 5. Attached hereto as **Exhibit 43** is a true and correct copy of a July 6, 2007 email chain
15 including an email from Jennifer McAleese of FlatWorld to Derek Wood of Rembrandt IP, and an
16 email from Derek Wood of Rembrandt IP to Paul Schneck and Russ Barron of Rembrandt IP, Bates
17 labeled REM-00000370 and designated Confidential by Rembrandt IP.

18 6. Attached hereto as **Exhibit 44** is a true and correct copy of a December 13, 2011
19 email chain from Jennifer McAleese to Slavko Milekic, Bates labeled FWAPP00006341-
20 FWAPP00006342.

21 7. Attached hereto as **Exhibit 45** is a true and correct copy of an August 24, 2009 email
22 forwarded from Slavko Milekic to Jen McAleese, Bates labeled FWAPP-00007052-FWAPP-
23 00007054.

24 8. Attached hereto as **Exhibit 46** is a true and correct copy of a June 20, 2013 email
25 from Mark Carlson of Hagens Berman to Michael Pieja.

26 9. Attached hereto as **Exhibit 47** is a true and correct copy of a set of demonstratives
27 that present portions of the exhibits to this declaration and to the May 25, 2013 declaration of
28

1 Michael T. Pieja in summary form.

2 10. Attached hereto as **Exhibit 48** is a copy of an excerpt from FlatWorld's Corrected
3 Second Amended Privileged and Redaction Document Log, served on April 3, 2013, sorted to show
4 only those entries with "litigation" as part or all of the purpose, and dated before November 2008.

5 11. Attached hereto as **Exhibit 49** is a true and correct copy of FlatWorld's Third
6 Amended Privileged and Redaction Document Log, served on May 31, 2013.

7 12. Attached hereto as **Exhibit 50** is a true and correct copy of an email dated May 30,
8 2013, from Ryan Meyer to Aaron Taggart.

9 13. Attached hereto as **Exhibit 51** is a true and correct copy of excerpted pages from the
10 May 28, 2013 Deposition of Michael J. Ossip.

11 I declare under penalty of perjury under the laws of the United States of America that the
12 foregoing is true and correct to the best of my knowledge and belief.

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14 Executed on June 25, 2013 at Chicago, Illinois.

15
16 /s/ Aaron Taggart
17 Aaron C. Taggart
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